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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 10-43329 RLE

**CHARLES GEORGE DAGGS and
JAMILA LASHON DAGGS,**

Chapter 13

Debtors.

**MOTION TO MODIFY CHAPTER 13 PLAN;
NOTICE TO CREDITORS OF
DEADLINE TO REQUEST A HEARING**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Debtors will include their 2010 IRS taxes in the amount of \$3,960.32 to their Chapter 13 Plan. Commencing August 2011, debtors will pay \$590.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:
Debtors are unable to pay their 2010 taxes in addition to their Chapter 13 Plan payment.

NOTICE IS HEREBY GIVEN:

(i) That Local Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California prescribes the procedures to be followed and that any objection to the requested relief, or a request for

1 hearing on the matter must be filed and served upon the undersigned
2 within twenty one (21) days of mailing of this notice;

3 (ii) That a request for hearing or objection must be accompanied
4 by any declarations or memoranda of law the party objecting or requesting
5 wishes to present in support of its position;

6 (iii) That if there is not a timely objection to the requested
7 relief or a request for hearing, the Court may enter an order granting
8 the relief by default; and

9 (iv) That the undersigned will give at least seven (7) days written
10 notice of hearing to the objecting or requesting party, and to any
11 trustee or committee appointed in the case, in the event an objection or
12 request for hearing is timely made.

13 Dated: August 29, 2011

14 /s/ Anne Y. Shiau
15 Anne Y. Shiau
16 Attorney for Debtors
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